

# United States District Court

Southern District of Texas

United States Magistrate Court  
DDQ-SDTX  
FILED

JUN 06 2013 2B

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

David J. Bradley, Clerk  
Laredo Division

V.

Erasmo TREJO-Nava

Case Number:

Carlos SOLIS-Garcia

Lucio RODRIGUEZ-Balderas

Emilio ORTIZ

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-2  
-3  
-4

[REDACTED] Laredo TX  
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **June 4, 2013**, in **Laredo, Texas, Webb County**, in the **Southern** District of **Texas**, defendants did knowingly and unlawfully conspire to possess a controlled substance listed under Schedule I, Title II of the Controlled Substances Act, to wit: approximately **117.28 kilograms (gross weight) of marijuana**, and knowingly and intentionally conspired possess with the intent to distribute the above mentioned controlled substance, in violation of **Title 21 United States Code, section 846**.

I further state that I am a **Special Agent with United States Homeland Security Investigations**, and that this complaint is based on the following facts:

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

SEE ATTACHMENT A

  
Micah Acox, Special Agent

Sworn to before me and subscribed in my presence

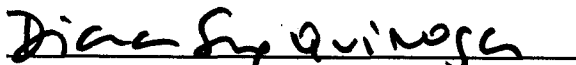
June 6, 2013

at

Laredo, Webb County, Texas

Diana Song-Quiroga

United States Magistrate Judge

  
Signature of Judicial Officer

ATTACHMENT A

I am a Special Agent of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

On June 4, 2013, agents conducting surveillance [REDACTED] Laredo, Texas, observed Erasmo TREJO-Nava at an open side gate to the property. TREJO was pacing around the gate, talking on the telephone and looking around. TREJO appeared to be waiting for something. While agents watched, the gate was blown closed by the wind several times, and either TREJO or a second individual, later identified as Lucio RODRIGUEZ-Balderas, would reopen it. Then agents observed a gray Chevrolet van approach the house and enter the gate, which was then closed by RODRIGUEZ. After approximately five minutes, the gate was reopened and the van departed. Several minutes later, TREJO came out with his phone to his ear and quickly closed the gate.

The gray Chevrolet van departed the residence and was followed and a traffic stop conducted by officers from Laredo Police Department (LPD). The driver of the van, later identified as Carlos SOLIS-Garcia, was found to be in possession of a small amount of suspected cocaine. LPD officers conducting the traffic stop were able to detect the odor of marijuana inside the van, and were able to see a dirty blanket and mud-stained carpet in the cargo area. A canine unit responded, and the police canine alerted to the odor of narcotics in the vehicle, however no additional contraband was discovered. SOLIS was detained. A Task Force Officer arrived and advised SOLIS of his rights pursuant to *Miranda*. SOLIS stated that he had been paid \$300 to transport marijuana from the riverbank area to the residence at [REDACTED]. This information was relayed to agents who remained at the residence

Agents decided to approach the house to speak to the residents. Agents identified themselves and then heard the sound of people fleeing. Agents observed TREJO and RODRIGUEZ climb onto a structure in the rear of the property. RODRIGUEZ was stopped on the roof and ordered to dismount, which he did. TREJO was able to exit the property and was apprehended moments later by LPD officers approximately a block away.

At this time, agents entered the carport for officer safety and gained entrance to the garage through an open bay door to search for any other individuals within the area. One additional individual, later identified as Emilio ORTIZ, was discovered hiding in a room inside a garage on the property and detained. In the room where ORTIZ was found, agents observed ropes and used cellophane wrappings. Additionally, a scale was seen inside the garage. Agents noticed a strong odor of marijuana coming from the room in which ORTIZ was hiding and in a second area where several cardboard boxes were located. Agents then secured the property and transported all four suspects to the HSI offices. ORTIZ was found to be in possession of approximately \$1,933 USD in cash.

At approximately 7:30 pm, Magistrate Judge Diana Song-Quiroga signed a search warrant for the residence and property located at [REDACTED] Laredo,

Texas. At approximately 7:40 pm, agents executed the search warrant on the property. Agents discovered a total of 117.28 kg of marijuana, 11 bundles of which were in one section of the garage area in three cardboard boxes. A black plastic trash bag containing loose marijuana was found in the room where ORTIZ was hiding. Agents also discovered approximately \$19,980 USD on a counter in the back of the property.

Agents advised TREJO of his *Miranda* rights and he agreed to answer questions. TREJO made several false and misleading statements to agents, which contradicted observations made by agents.

Agents advised SOLIS of his *Miranda* rights and SOLIS agreed to answer questions. SOLIS admitted that he was paid to transport the van containing the marijuana from a house the downtown area of Laredo to the location on Corpus Christi Street.

Agents advised RODRIGUEZ of his *Miranda* rights and he agreed to answer questions. RODRIGUEZ stated that he worked and lived at the location. RODRIGUEZ admitted that he had opened the gate for the gray van to enter the property and that he had helped unload the marijuana from the van.

Agents advised ORTIZ of his *Miranda* rights and he agreed to answer questions. ORTIZ stated that he had been living at the Corpus Christi location with Lucio (RODRIGUEZ). ORTIZ stated that he had seen the wrappings and smelled marijuana in the room where he slept. ORTIZ stated that the shop at the rear of the property is no longer an operational business.